

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

communicate with officials at affected State agencies, we respectfully request an extension of the reply period.

A continuance of the hearing is necessary because the United States desires at least 7 days to review Plaintiffs' reply brief before the hearing. On the scheduling call, the Court stated that its calendar was open for a hearing on January 14, 15, or 16, 2015, and counsel for the Plaintiffs confirmed the availability of those dates by calling the Court's case manager. And this continuance will not prejudice the parties, given the Defendants' declaration that they would not begin implementing the challenged program until late February at the earliest.

CONCLUSION

Plaintiffs respectfully request a continuance of the preliminary injunction hearing to January 14, 2015 and an extension of the time to file Plaintiffs' reply brief to and including January 7, 2015.

Respectfully submitted.

LUTHER STRANGE
Attorney General of Alabama

GREG ABBOTT
Attorney General of Texas

THOMAS C. HORNE
Attorney General of Arizona

DANIEL T. HODGE
First Assistant Attorney General

DUSTIN McDANIEL
Attorney General of Arkansas

JAMES D. BLACKLOCK
*Deputy Attorney General for Legal
Counsel*

PAMELA JO BONDI
Attorney General of Florida

/s/ Andrew S. Oldham
ANDREW S. OLDHAM
Deputy Solicitor General
Attorney-in-Charge
State Bar No. 24081616

SAMUEL S. OLENS
Attorney General of Georgia

LAWRENCE G. WASDEN
Attorney General of Idaho

Office of the Attorney General of Texas
P.O. Box 78711
Austin, Texas 78711-2548
512-936-1700

JOSEPH C. CHAPELLE
PETER J. RUSTHOVEN
Counsel for the State of Indiana

DEREK SCHMIDT
Attorney General of Kansas

JAMES D. "BUDDY" CALDWELL
Attorney General of Louisiana

TIMOTHY C. FOX
Attorney General of Montana

JON C. BRUNING
Attorney General of Nebraska

WAYNE STENEHJEM
Attorney General of North Dakota

MICHAEL DEWINE
Attorney General of Ohio
ERIC E. MURPHY
Co-counsel for the State of Ohio

E. SCOTT PRUITT
Attorney General of Oklahoma

ALAN WILSON
Attorney General of South Carolina

MARTY J. JACKLEY
Attorney General of South Dakota

SEAN D. REYES
Attorney General of Utah

PATRICK MORRISEY
Attorney General of West Virginia

J.B. VAN HOLLEN
Attorney General of Wisconsin

BILL SCHUETTE
*Attorney General for the People of
Michigan*

DREW SNYDER
Counsel for the Governor of Mississippi

PAUL R. LEPAGE
Governor of Maine

ROBERT C. STEPHENS
*Counsel for the Governor of North
Carolina*

TOM C. PERRY
CALLY YOUNGER
Counsel for the Governor of Idaho

CERTIFICATE OF SERVICE

I certify that I served a copy of this pleading on the following counsel for the Defendants via Federal Express, next-day service:

Adam Kirschner
Kyle Freeny
Trial Attorneys
U.S. Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Ave., NW, Room 7126
Washington D.C. 20001

/s/ Andrew S. Oldham
ANDREW S. OLDHAM

CERTIFICATE OF CONFERENCE

I certify that my colleague Arthur D'Andrea conferenced with counsel for the United States, and the Defendants do not oppose this motion.

/s/ Andrew S. Oldham
ANDREW S. OLDHAM